

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

<b>JOSE and ROSE MEJIA and OSMAN and AZRA ZHIROVIC,</b>	)	
	)	
	)	
<b>Plaintiffs,</b>	)	
	)	
v.	)	<b>No. 08 C 1386</b>
	)	
<b>AMERIQUEST MORTGAGE COMPANY, and DEUTSCHE BANK NATIONAL TRUST COMPANY,</b>	)	<b>Judge Kennelly</b>
	)	
	)	
<b>Defendants.</b>	)	

**DEFENDANTS' (AGREED) MOTION FOR EXTENSION OF TIME TO FILE  
RESPONSIVE PLEADINGS TO PLAINTIFFS' COMPLAINT**

Defendants, Ameriqurest Mortgage Company and Deutsche Bank National Trust Company (“Defendants”), move, with the agreement of Plaintiffs, for an extension of time to file Defendants’ responsive pleadings to Plaintiffs’ complaint. In support of their motion, Defendants state as follows:

1. There is pending in the U.S. District Court for the Northern District of Illinois the MDL proceeding In re Ameriqurest Mortgage Co., Mortgage Lending Practices Litigation, MDL Docket No. 1715, Lead Case No. 05 C 7097 (Aspen, J.) (“Ameriqurest MDL Litigation”). The Ameriqurest MDL Litigation includes many individual and putative class lawsuits challenging loans originated by Ameriqurest Mortgage Company.

2. Defendants will file this week before Judge Aspen, the presiding judge of the Ameriqurest MDL Litigation, Defendants’ motion for reassignment of related action, requesting the reassignment of this lawsuit to the Ameriqurest MDL Litigation. Plaintiffs agree to the reassignment of this lawsuit to the Ameriqurest MDL proceeding. Judge Aspen has found other similar lawsuits to

be appropriate related actions and has reassigned hundreds of individual lawsuits to the Amerquest MDL Litigation.

3. Defendants anticipate that Judge Aspen will find this lawsuit, as Judge Aspen has found other lawsuits, to be an appropriate related action and will reassign this lawsuit to the Amerquest MDL Litigation.

4. The Judicial Panel on Multidistrict Litigation established the Amerquest MDL Litigation to create certain litigation efficiencies. Anticipating the reassignment of this lawsuit to the Amerquest MDL Litigation, Defendants request an extension of time to file their responsive pleadings to Plaintiffs' complaint until 30 days after the lawsuit is reassigned to the Amerquest MDL proceeding (so that Defendants may enjoy the efficiencies of the Amerquest MDL Litigation and may file their responsive pleadings to Plaintiffs' complaint in the Amerquest MDL Litigation).

WHEREFORE, Defendants, Amerquest Mortgage Company and Deutsche Bank National Trust Company, respectfully request this Court to grant their motion and to extend the time for Defendants to file their responsive pleadings to Plaintiffs' complaint until 30 days after the lawsuit is reassigned to the Amerquest MDL proceeding (or, if Judge Aspen surprisingly denies Defendants' motion for reassignment, then 30 days after Judge Aspen's denial).

Dated: March 31, 2008

Respectfully submitted,

AMERIQUEST MORTGAGE COMPANY and  
DEUTSCHE BANK NATIONAL TRUST  
COMPANY, Defendants

By: s/ Jonathan N. Ledsky  
One of their Attorneys

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**CERTIFICATE OF SERVICE**

Jonathan N. Ledsky, an attorney, hereby certifies that a true and correct copy of the foregoing **Defendants' (Agreed) Motion for Extension of Time to File Responsive Pleadings to Plaintiffs' Complaint** was served electronically upon counsel of record:

**Anthony P. Valach, Jr.** ([anthonyvalach@sbcglobal.net](mailto:anthonyvalach@sbcglobal.net))  
**Daniel Mark Harris** ([lawofficedh@yahoo.com](mailto:lawofficedh@yahoo.com))

this 31st day of March, 2008.

s/ Jonathan N. Ledsky